

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
PECOS DIVISION**

|   |   |                             |
|---|---|-----------------------------|
| <b>BRANDON ANDERSON, DATARIK<br/>BOX,</b>   | § |                             |
| <b>ISABEL CORREA, LILY GALANIS,<br/>KASANDRA HALL, HARMONY<br/>HUNT,</b>  | § |                             |
| <b>LAKEITHSHA KING, JULIO<br/>MENDOZA,</b>  | § |                             |
| <b>AMANDA THOMAS and CYNTHIA<br/>VAZQUEZ, Each Individually and on<br/>Behalf of All Others Similarly Situated,</b> | § |                             |
| <b>Plaintiffs</b>   | § |                             |
| <br><b>v.</b>   | § |                             |
| <b>MVM, INC.,</b>   | § | Civil Action No. 4:22-cv-15 |
| <b>Defendant.</b>   | § |                             |
|   | § |                             |
|   | § |                             |

**JOINT MOTION FOR ADDITIONAL STAY OF PROCEEDINGS PENDING  
SETTLEMENT EFFORTS**

Plaintiffs Brandon Anderson, Datarik Box, Isabel Correa, Lily Galanis, Kasandra Hall, Harmony Hunt, Lakeithsha King, Julio Mendoza, Amanda Thomas, and Cynthia Vazquez (collectively referred to as “Plaintiffs”) and Defendant MVM, Inc. (“Defendant” and/or “MVM”), jointly request an additional 60-day stay of this action for all purposes so that the parties may continue to pursue settlement discussions in an effort to resolve their dispute. The parties respectfully show the following in support of their request:

1. On April 20, 2022, Plaintiffs filed their Complaint with this Court alleging that MVM failed to pay them for all hours worked in violation of the Fair Labor Standards Act.
2. On January 17, 2023, the parties requested a stay of this action to engage in good-faith settlement discussions in an attempt to resolve plaintiffs’ claims. On March 20, 2023, the parties requested an additional 45-day stay of this action to continue to pursue settlement discussions. On May 4, 2023, the parties requested an additional 60-day stay of this action to

continue pursuing settlement discussions. That stay expires today, July 5, 2023.

3. The parties have exchanged settlement offers and have continued to make progress in their settlement efforts. In addition, and more recently, Defendant has produced Plaintiffs' time and pay records as part of the efforts to resolve this case. The parties continue to believe such discussions will be their best opportunity to resolve this dispute without incurring significant additional litigation fees and costs which, once incurred, likely will have a negative impact on the ability of the parties to resolve the case via settlement.

4. Accordingly, in furtherance of the parties' settlement efforts, the parties jointly request an additional 60-day stay of the case for all purposes. The parties believe this should provide them with sufficient time to determine whether this action can resolve without the need for further litigation. The parties do not anticipate seeking another extension of the stay unless they have reached a settlement in principle, or a potential settlement is imminent. If the parties have not resolved their dispute by September 4, 2023, then no later than September 4, 2023, the parties will either request an additional stay to continue settlement discussions or submit a proposed revised scheduling order. Any proposed revised scheduling order will include a new deadline to complete discovery.

5. No prejudice will result to either party by granting this request, which is not made for purposes of delay.

WHEREFORE, the parties request that the Court grant the relief requested herein and stay all proceedings in this matter until September 4, 2023.

Dated: July 5, 2023

Respectfully submitted,

*/s/ Colby Qualls*

Josh Sanford  
Tex. Bar No. 24077858  
[josh@sanfordlawfirm.com](mailto:josh@sanfordlawfirm.com)  
Colby Qualls  
Ark. Bar No. 2019246  
[colby@sanfordlawfirm.com](mailto:colby@sanfordlawfirm.com)  
SANFORD LAW FIRM, PLLC  
Kirkpatrick Plaza  
10800 Financial Centre Pkwy,  
Suite 510  
Little Rock, Arkansas 72211

**ATTORNEYS FOR PLAINTIFFS**

*/s/ Kimberly R. Miers*

Kimberly R. Miers  
Texas Bar No. 24041482  
[kmiers@littler.com](mailto:kmiers@littler.com)  
**LITTLER MENDELSON**  
**A PROFESSIONAL CORPORATION**  
100 Congress Avenue, Suite 1400  
Austin, Texas 78701  
512.924.7087 (Telephone)  
512.532.6501 (Facsimile)

*/s/ Joshua B. Waxman*

Joshua B. Waxman (*pro hac vice*)  
D.C. Bar No. 482135  
[jwaxman@littler.com](mailto:jwaxman@littler.com)  
Allison S. Papadopoulos (*pro hac vice*)  
D.C. Bar No. 1020310  
[apapadopoulos@littler.com](mailto:apapadopoulos@littler.com)  
**LITTLER MENDELSON**  
**A PROFESSIONAL CORPORATION**  
815 Connecticut Avenue NW, Suite 400  
Washington, DC 20006.4046  
202.842.3400 (Telephone)  
202.842.0011 (Facsimile)

*/s/ Richard W. Black*

Richard W. Black (*pro hac vice*)  
Georgia Bar No. 355846  
[rblack@littler.com](mailto:rblack@littler.com)  
**LITTLER MENDELSON**  
**A PROFESSIONAL CORPORATION**  
3424 Peachtree Road, NE, Suite 1200  
Atlanta, GA 30326.4803  
404.233.0330 (Telephone)  
404.233.2361 (Facsimile)

**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th day of July, 2023, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing upon the counsel below:

Kimberly R. Miers, Esq.  
LITTLER MENDELSON, P.C.  
100 Congress Avenue, Suite 1400  
Austin, Texas 78701  
Telephone: (512) 924-7087  
Facsimile: (512) 532-6501  
[kmiers@littler.com](mailto:kmiers@littler.com)

Joshua B. Waxman, Esq.  
Allison Papadopoulos, Esq.  
LITTLER MENDELSON, P.C.  
815 Connecticut Avenue NW, Suite 400  
Washington, DC 20006.4046  
Telephone: (202) 842-3400  
Facsimile: (202) 842-0011  
[jwaxman@littler.com](mailto:jwaxman@littler.com)  
[apapadopoulos@littler.com](mailto:apapadopoulos@littler.com)

Richard W. Black, Esq.  
LITTLER MENDELSON, P.C.  
3424 Peachtree Road, Suite 1200  
Atlanta, Georgia 30326.4803  
Telephone: (404) 233-0330  
Facsimile: (404) 233-2361  
[rblack@littler.com](mailto:rblack@littler.com)

\_\_\_\_\_  
*/s/ Colby Qualls*  
**Colby Qualls**